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September 8, 2021

Via CM/ECF

Hon. Joseph H. Rodriguez, U.S. D.J.
United States District Court, District of New Jersey Camden
Mitchell H. Cohen U.S. Courthouse
Room 6010
1 John F. Gerry Plaza, 4th & Cooper Sts.
Camden, NJ 08101

Re: Jane Doe v. Marty Small, Sr., et al.
Civil Action No. 1:21-cv-11189-JHR-SAK

Dear Judge Rodriguez:

The undersigned represents defendant La-Quetta Small in the above-referenced matter. We intend to move to dismiss the amended complaint pursuant to Fed. R. Civ. P. 12(b)(6). Due to the number and complexity of the issues raised in the amended complaint, we respectfully request permission pursuant to Local Civ. Rule 7.2(b) to file a six page overlength brief. We have contacted plaintiff's counsel for consent and are awaiting a response. Of course, we would consent to plaintiff filing an overlength brief in opposition if requested.

Thank you for your attention to this matter. Please feel free to contact me with any questions.

Respectfully submitted,

/s/ Jeffrey L. Shanaberger

Jeffrey L. Shanaberger

JLS/pm

cc: Terrell A. Ratcliff, Esq.
Benjamin H. Zieman, Esq.